

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

NOVARTIS AG, NOVARTIS
PHARMACEUTICALS CORPORATION,
MITSUBISHI TANABE PHARMA
CORPORATION, and MITSUI SUGAR CO.,
LTD

Plaintiffs,

v.

EZRA VENTURES, LLC

Defendant.

Civil Action No. 4:15-cv-00095-KGB

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF MOTION TO STAY THE
SECOND-FILED CASE IN THE EASTERN DISTRICT OF ARKANSAS**

COME NOW the Plaintiffs, Novartis AG, Novartis Pharmaceuticals Corp., Mitsubishi Tanabe Pharmaceutical Corporation, and Mitsui Sugar Co., Ltd. ("Plaintiffs"), by and through their counsel of record, for their unopposed motion for leave to file reply in support of their Motion to Stay the Second-Filed Case in the Eastern District of Arkansas, state:

1. On May 22, 2015, Plaintiffs filed their Motion to Stay the Second-Filed Case in the Eastern District of Arkansas (Doc. No. 26) in this matter.

2. On June 5, 2015, Ezra Ventures, LLC ("Defendant") filed its response to the Plaintiffs' Motion (Doc. No. 28). Defendant raised issues in its response that Plaintiffs desire to address and clarify through the filing of a Reply.

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3. Plaintiffs have contacted Defendant's counsel who has stated that Defendant has no objection to Plaintiffs' Motion for Leave to File Reply.

4. Plaintiffs respectfully request that the Court grant them leave to reply to the Defendant's response to Plaintiffs' Motion to Stay.

WHEREFORE, for the above stated reasons, the Plaintiffs respectfully request that the Court grant them leave to file a reply in support of their Motion to Stay the Second-Filed Case in the Eastern District of Arkansas, that the reply be due on June 12, 2015, and that the Court grant all other just and proper relief.

Respectfully submitted,

/s/ Clifford W. Plunkett

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CERTIFICATE OF SERVICE

I, Clifford W. Plunkett, hereby certify that on June 9, 2015, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

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